

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KEVIN HILL,)
)
Plaintiff,)
)
v.) Case No. 1:24-cv-937
)
ORKIN, LLC)
)
Defendant.)

**DEFENDANT ORKIN, LLC'S UNOPPOSED MOTION FOR AN EXTENSION OF
TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendant, Orkin, LLC (“Orkin”) or (“Defendant”), by and through its attorneys, Fisher & Phillips LLP, respectfully request a 21-day extension of time, up to and including February 29, 2024, to answer, move, or otherwise respond to Plaintiff Kevin Hill’s (“Plaintiff”) Complaint. In support thereof, Defendant avers as follows:

1. On December 29, 2023, Plaintiff Kevin Hill (“Plaintiff”), filed a five-count “Complaint” in the Circuit Court of Cook County, Illinois, captioned: *Kevin Hill v. Orkin*, Case No. 2023L013130 (the “State Court Action”). In the State Court Action, Plaintiff alleges claims for civil rights violations pursuant to the Illinois Human Rights Act (“IHRA”) based on age and physical disability discrimination, wrongful termination, and negligent and fraudulent misrepresentation.

2. On January 2, 2024, the Cook County Clerk of Court issued Summons in the State Court Action as to Orkin, LLC. On January 2, 2024, counsel for the Plaintiff emailed outside counsel with a copy of the Complaint filed in the State Court Action and a waiver of service.

3. On February 1, 2024, Defendant removed the State Court Action to the Northern District of Illinois. Accordingly, pursuant to Fed. R. Civ. P. 81(c)(2)(c), Defendant's answer or other responsive pleading is due to the Court by February 8, 2024. (Doc. #1)

4. Defendant's undersigned counsel needs additional time to investigate and prepare its response to Plaintiff's Complaint.

5. This extension of time is made in good faith and not for purposes of undue delay or prejudice.

6. No party will be prejudiced if the Court grants this routine motion.

7. Additionally, the requested extension will not interfere with any dates previously set by the Court as no such dates have previously been set.

8. Counsel for Defendant has conferred with Plaintiff's counsel, who consent to the relief requested herein.

9. This is Defendant's first request for an extension of time to answer or otherwise respond to the Complaint.

WHEREFORE, Defendant respectfully requests a 21-day extension of time, up to and including February 29, 2024, to answer, move, or otherwise respond to Plaintiff's Complaint.

Dated: February 6, 2024

Respectfully submitted,

Defendant Orkin, LLC

By: s/ Steve A. Miller
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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on February 6, 2024, the foregoing **DEFENDANT ORKIN, LLC'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT** was filed using the Court's electronic filing system and will also be sent via email and Certified Mail to the following counsel of record:

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/s/ Steve A. Miller